UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

INFORMATION

GERMAIN MORENO-HERNANDEZ,

a/k/a "Miguel Martinez-Campos,"

07 Cr.

Defendant.

07 CRIM 861

## COUNT ONE

The United States Attorney charges:

- 1. In or about May 2007, in the Southern District of New York and elsewhere, GERMAIN MORENO-HERNANDEZ, a/k/a "Miguel Martinez-Campos," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Section 1956(a)(1)(B)(i) of Title 18, United States Code.
- 2. It was a part and an object of the conspiracy that GERMAIN MORENO-HERNANDEZ, a/k/a "Miguel Martinez-Campos," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, the transfer and deposit of more than \$100,000 in cash that represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved proceeds of specified unlawful activity, to wit, the

proceeds of narcotics trafficking, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

## Overt Act

- 3. In furtherance of the conspiracy and to effect the illegal object thereof, GERMAIN MORENO-HERNANDEZ, a/k/a "Miguel Martinez-Campos," the defendant, committed the following overt act, among others, in the Southern District of New York and elsewhere:
- a. On or about May 31, 2007, in Dover, New Jersey, GERMAIN MORENO-HERNANDEZ, a/k/a "Miguel Martinez-Campos," the defendant, possessed approximately \$48,000 in narcotics proceeds.

(Title 18, United States Code, Section 1956(h).)

## FORFEITURE ALLEGATION

4. As a result of committing the money laundering offense alleged in Count One of this Information, GERMAIN MORENO-HERNANDEZ, a/k/a "Miguel Martinez-Campos," the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 982, any and all property, real and personal, involved in the money laundering offense and all property traceable to such property, including but not limited to the following:

a. All United States currency recovered on or about May 31, 2007, from GERMAIN MORENO-HERNANDEZ, a/k/a "Miguel Martinez-Campos," the defendant, in the vicinity of 13 New Street, Dover, New Jersey, which includes approximately \$48,000 in cash.

(Title 18, United States Code, Sections 982 and 1956.)

MICHAEL J. GARCIA

United States Attorney

Michael J. Han